

CASE NO.: 7:24-CV-00317-DC-RCG MIDLAND-ODESSA DIVISION

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION**

CONTIQUE WILLCOT,  
Plaintiff,  
vs.  
SECURITIES AND EXCHANGE COMMISSION, ET  
AL,  
Defendant

Case No.: 7:24-cv-00317-DC-RCG

**PLAINTIFF'S REPLY TO GTS SECURITIES LLC  
AND ARI RUBENSTEIN'S OPPOSITION TO  
MOTION TO LIFT PSLRA DISCOVERY STAY**

## I. INTRODUCTION

As a pro se Fire Lieutenant and Origin and Cause Fire Investigator, I respectfully reply to GTS Securities LLC and Ari Rubenstein’s opposition (Dkt. No. 40) to my Motion to Lift the PSLRA Discovery Stay (15 U.S.C. § 78u-4(b)(3)(B)). GTS’s counsel artfully mischaracterizes my position, falsely claiming my damages are “entirely attributable” to FINRA’s U3 halt (Dkt. No. 3 at 4 ¶ 1(e)), to mislead the Court. Their irrelevant Corporate Disclosure Statement (Dkt. No. 35), addressing ownership never raised, further evades my allegations of market manipulation (Exs. A, S, B, AA). My motion seeks Blue Sheets and TRCH/MMTLP data (June 21, 2021–December 12, 2022) to prove GTS’s naked short selling and synthetic share creation, which caused my \$30,000+ loss (Exs. V, W). GTS’s arguments fail to rebut PSLRA criteria or my evidence.

CASE NO.: 7:24-CV-00317-DC-RCG MIDLAND-ODESSA DIVISION

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2 **II. GTS MISCHARACTERIZES PLAINTIFF'S CLAIMS**

3 GTS alleges my damages stem solely from FINRA's halt and are "self-inflicted"  
 4 for not selling shares at a \$75,984.87 profit (Dkt. No. 40 at 2-3; Dkt. No. 32-25).  
 5 My complaint asserts GTS's naked short selling and synthetic share creation (Dkt.  
 6 No. 3 at 14 ¶ 46, 17 ¶ 70; Ex. S: GTS as sole order destination; Ex. A at 9: 13M  
 7 share spike, FTD anomalies) suppressed MMTLP prices, causing losses (Exs. V,  
 8 W) before the halt, which exacerbated harm. In *Lujan v. Defenders of Wildlife*,  
 9 504 U.S. 555, 560-61 (1992), the Supreme Court held that standing requires an  
 10 injury fairly traceable to the defendant's conduct, redressable by relief. GTS's  
 11 manipulation (Ex. B: spoofing; Ex. AA: SEC lawsuit confirming TRCH fraud)  
 12 directly injured me, satisfying causation. My strategy to hold shares anticipated a  
 13 short squeeze (Dkt. No. 3 at 21 ¶ 94), supported by Level 2 data showing orders at  
 14 100x the closing price (Ex. A). GTS's reliance on *Cameron Cty. Hous. Auth. v.*  
 15 *City of Port Isabel*, 997 F.3d 619, 623 (5th Cir. 2021), is misplaced. In *Cameron*  
 16 *Cty.*, the Fifth Circuit denied standing because the plaintiff's loss of federal  
 17 funding resulted from its failure to meet third-party conditions, a context  
 18 unrelated to GTS's securities fraud. Here, GTS's actions caused my harm, not my  
 19 trading decisions.

20

21 **III. PSLRA CRITERIA ARE SATISFIED**

22 The PSLRA stay causes undue prejudice, preventing access to Blue Sheets critical  
 23 to prove GTS's trade orders (Ex. S), risking dismissal (*In re Bank of Am. Corp.*,  
 24

CASE NO.: 7:24-CV-00317-DC-RCG MIDLAND-ODESSA DIVISION

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2 2009 WL 4796169 (S.D.N.Y. 2009)). Ex. AA confirms systemic fraud GTS  
3 enabled. Evidence preservation is urgent, as Ex. U (Vermont preservation order)  
4 and Ex. AC (2027 TDDS log destruction risk) demonstrate (*SG Cowen Sec. Corp.*  
5 *v. U.S. Dist. Ct.*, 189 F.3d 909 (9th Cir. 1999)). Evidence of fraud in TRCH,  
6 linked to MMTLP, dates to 2019 (Ex. AA), yet I conservatively request data from  
7 2021, ensuring a focused scope.  
8  
9

10 **IV. CONSTITUTIONAL CHALLENGE IS VALID**  
11

12 GTS misrepresents my as-applied PSLRA challenge (Dkt. No. 3 at 59-61) as  
13 barring statutory relief. I contest its barriers to retail investors, not its procedures,  
14 consistent with *Heckler v. Mathews*, 465 U.S. 728, 740 (1984). GTS's citation of  
15 *United States v. Portillo-Munoz*, 643 F.3d 437 (5th Cir. 2011), a criminal case, is  
16 inapposite to civil discovery.  
17  
18

19 **V. CONCLUSION**  
20

21 GTS's calculated mischaracterization ignores my evidence (Exs. A, S, B, AA). As  
22 a pro se investigator, my diligence in identifying GTS's manipulation (Exs. A, S)  
23 merits leniency (*Haines v. Kerner*, 404 U.S. 519 (1972)). I respectfully request  
24 the Court grant my motion to ensure justice.  
25  
26

27 **PRAYER FOR RELIEF**  
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1. Grant the Motion to Lift the PSLRA Stay.

CASE NO.: 7:24-CV-00317-DC-RCG MIDLAND-ODESSA DIVISION

1  
2. Order expedited Blue Sheet discovery within 30 days.

3. Other just relief.

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5  
6 Respectfully,

7 /s/ Contique Willcot

8 Contique Willcot, Pro Se

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10 contiq9@yahoo.com

11  
12 **CERTIFICATE OF SERVICE**

13 On May 7, 2025, I served this reply via CM/ECF on counsel for all Defendants: SEC  
14 (reichere@sec.gov, rosej@sec.gov), FINRA (1735 K St NW, Washington, DC), GTS  
15 Securities LLC (lmurphy@mbssmartlaw.com, cjb@williamsbarbermorel.com), Ari  
16 Rubenstein (545 Madison Ave, NY), Next Bridge Hydrocarbons  
17 (cnewcomer@christianattarlaw.com, jchristian@christianattarlaw.com), John Brda, and  
18 Gregory McCabe (jason.hopkins@us.dlpiper.com, jepennington@permian.law).

19  
20 /s/ Contique Willcot